

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR CRIMINAL COMPLAINT**

I, Task Force Officer Jeffrey M. Brown, being duly sworn, depose and state as follows:

**Introduction and Agent Background**

1. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant.

2. I am a Detective Sergeant with the Middleborough Police Department, where I have been employed since 2012. In addition, since 2018, I have been assigned to the Financial Investigations Team of the New England Field Division of the Drug Enforcement Administration (“DEA”) as a Task Force Officer. I am a graduate of the MBTA Transit Police Academy.

3. As a Middleborough Police Detective and DEA Task Force Officer, I am authorized to investigate violations of the laws of the United States, including violations of federal narcotics laws in Title 21 of the United States Code. I have received training regarding narcotics investigations while attending the police academy and have attended additional specialized training courses in furtherance of my past and current assignments, including the Basic Narcotic Investigation course conducted and presented by the DEA training staff.

4. I have participated in all aspects of drug investigations, including physical surveillance, surveillance of undercover transactions, the introduction of undercover agents, the execution of search warrants, the effecting of arrests, and debriefings of defendants, informants and witnesses who had personal knowledge regarding major narcotics trafficking organizations. I have also reviewed recorded conversations and telephone, financial, and drug records. Through my training and experience, I have become familiar with the manner in which illegal drugs are imported, transported, stored, and distributed, and the methods of payment for such drugs. I have

also become familiar with the manner in which narcotics organizations utilize various forms of violence and intimidation in furtherance of their narcotics trafficking activity, to protect their operations, members, narcotics, and narcotics proceeds.

**Purpose of the Affidavit**

5. I submit this affidavit in support of an application for a criminal complaint charging (1) Anderson Ernesto Andujar Echavarria (“Andujar”), (2) Waner Bernabel Presinal (“Bernabel”), and (3) Carlos Fabal (“Fabal”) with conspiracy to distribute and possess with intent to distribute controlled substances, including fentanyl, methamphetamine, and cocaine, in violation of Title 21, United States Code, Section 846.

6. The statements contained in this affidavit are based on my participation in the investigation of the criminal activity described herein, as well as information provided to me by other federal agents and police officers involved in this investigation, and my experience, training, and background as a Task Force Agent with the DEA. Since the affidavit is being submitted for the limited purpose of securing the requested criminal complaint, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish the requisite probable cause.

7. As is set out below, late last year, agents commenced an investigation into Andujar, who over the past ten months has been recorded distributing thousands of pressed fentanyl tablets as well as powdered fentanyl, cocaine, and crystal methamphetamine to an undercover agent (“UC”). Through physical surveillance and information derived from search warrants to track the locations of cellular telephones and automobiles used by Andujar and others to distribute controlled substances, agents identified Bernabel as a co-conspirator who worked with Andujar to distribute fentanyl pills and identified Fabal as a fentanyl pill supplier to Andujar.

### Probable Cause

8. ANDUJAR. In November 2023, a DEA confidential source (“CS”)<sup>1</sup> provided information about a Dominican male known to the CS as “Anderson,” later identified as Andujar, who the CS identified as a drug distributor who resided in Dorchester, Massachusetts. The CS provided agents with a phone number for Andujar and at the direction of agents met with Andujar in mid-November 2023. During this meeting, which was not recorded, Andujar and the CS discussed varying quantities of other drugs, too, including fentanyl powder; gram and kilogram quantities of cocaine, and “crystal,” which I believed referred to crystal methamphetamine. Andujar told the CS that he could sell up to 30,000 pressed fentanyl pills at a time.

9. On December 5, 2023, the CS and the UC met with Andujar in an undercover vehicle on Fenelon Street in Dorchester. During that meeting, which was recorded, Andujar provided the UC with a free sample of a bag of white powder, later analyzed and determined to be cocaine, a Schedule II controlled substance, and discussed Andujar providing a sample of pressed fentanyl pills in the near future. Andujar provided the UC with two phone numbers for the UC to use to contact Andujar, 857-385-2855 (the 2855 Number, discussed below) and 857-693-8812. Later that day, the UC received a text from Andujar indicating that Andujar currently had 7,000 fentanyl pills available for sale. They agreed to meet the following day, December 6, 2023, at the South Bay shopping center in Boston so that Andujar could provide the UC a free sample of 30 fentanyl pills.

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<sup>1</sup> The CS began cooperating after agents seized cocaine from the CS in 2021. The CS has not been charged in connection with that offense and has been cooperating with law enforcement in the hopes of receiving leniency at an eventual sentencing hearing. The CS’s criminal history includes a dismissed charge for motor vehicle infractions but no convictions. In order to facilitate the CS’s cooperation, agents have secured deferred action for the CS so that the CS can lawfully remain in the United States. Agents have corroborated information provided by the CS through surveillance and narcotics seizures.

10. On December 6, 2023, at around 11:12 a.m., the UC texted Andujar that he would be at the South Bay shopping center in about ten minutes. At 11:43 a.m., the UC spoke with Andujar and agreed to pick up Andujar at the entrance of the Target store located at the South Bay shopping center in the UC's vehicle. Two minutes later, Andujar exited the Target store and entered the front passenger seat of the UC's vehicle. During the recorded meeting, Andujar handed the UC a small clear bag containing several pills believed to be mixed with fentanyl which were blue and white labeled with an "M" and a "30." Based on my training and experience, I know that Percocet prescription pills are labeled M/30, and based on the appearance of the pill, I believed they were counterfeit Percocet pills. Andujar told the UC that the bag contained two types of pills, both blue and white, so that the UC could sample both. When the UC asked Andujar how "they" were making the pills, Andujar responded a "machine" (which investigators believe to be a tablet press machine). Andujar showed the UC a photograph on his (Andujar's) phone depicting seven clear plastic bags of pills, which Andujar said were the 7,000 pills that Andujar had offered to sell to the UC. The UC asked Andujar if he could photograph the pills so that the UC could show his clients and Andujar agreed. A certificate of analysis from the DEA's Northeast Regional Laboratory (NERL) confirmed that the pills contained fentanyl.

11. On December 6, 2023, DEA Special Agent Ryan Glynn showed the UC a Registry of Motor Vehicles (RMV) driver's license photograph of Andujar and the UC identified the images as the person he met with on December 5 and 6, 2023.

12. These introductory meetings enabled agents to conduct a series of audio and video recorded meetings between Andujar and the UC where Andujar distributed thousands of pressed fentanyl pills. All of these meetings took place in a similar fashion. In the run up to the meetings, the UC and Andujar communicated with each other through a combination of text messages, voice

calls, or WhatsApp communications (these communications have been preserved). In these exchanges, Andujar and the UC discussed the quantities of controlled substances Andujar would provide the UC, the prices Andujar would charge the UC, and the meeting locations for the deals. The meetings typically took place inside the UC's vehicle and were audio – video recorded and surveilled by agents.

13. Andujar distributed fentanyl to the UC on the following dates:

<u>Date</u>	<u>Location</u>	<u>Quantity</u>	<u>Seller</u>
Dec. 13, 2023	South Bay shopping center, Boston, Mass.	2,000 pressed fentanyl pills	Andujar, with Bernabel
Feb. 1, 2024	99 Commerce Way, Woburn, Mass.	2,000 pressed fentanyl pills	Andujar
April 12, 2024	60 Station Landing, Medford, Mass.	2,000 pressed fentanyl pills, sample of crystal methamphetamine	Andujar, with Bernabel
April 29, 2024	17 Melville Road, Somerville, Mass.	Sample of fentanyl & methamphetamine	Andujar
August 16, 2024	261 North Avenue, Wakefield, Mass.	2,000 pressed fentanyl pills and sample of power fentanyl	Andujar, with Fabal

14. As of the date of this affidavit, I have received analyses from the DEA's Northeast Regional Laboratory (NERL) which confirmed that the pills Andujar handed to the UC on December 13, 2023, February 1, 2024, and April 12, 2024 contained a combined net weight of 660.27 grams of fentanyl, a Schedule II controlled substance. The DEA laboratory has also confirmed that Andujar distributed cocaine and methamphetamine, both Schedule II controlled

substances. In addition to the initial identification of Andujar by the UC, I have identified Andujar as the distributor of the fentanyl pills and other controlled substances set out above, either through physical surveillance of the meeting, or my review of the video recording of the meetings between Andujar and the UC, or both.

15. BERNABEL. Based on the following evidence, I have identified Bernabel as a drug trafficking co-conspirator of Andujar's:

16. Bernabel Assisted Andujar on the December 13, 2023 Deal. As noted above, on December 13, 2023, agents recorded Andujar as he distributed approximately 2,000 pressed fentanyl pills to the UC. The meeting between Andujar and the UC took place at approximately 11:17 a.m. Before the meeting, at 10:06 a.m., Andujar's 2855 Number, provided by Andujar to the UC on December 5, 2023, received an incoming one minute and 15 second call from 617-372-7335, a number subscribed to Bernabel at 220 High Street, Brookline, Massachusetts. After the meeting with Andujar and the UC, Andujar was picked up in a white 2008 Ford Edge registered to Gisel Solainy Arias-Mendez, of 220 High Street, Apartment 4, Brookline, Massachusetts. Agents identified the driver of the Ford Edge as Bernabel.

17. Andujar's Arrest and New Telephone Number. On December 29, 2023, Andujar was arrested by the Quincy Police Department for drug distribution and his two phones were seized. After he was released, Andujar provided the UC with a new telephone number, 857-396-8063 (Andujar's 8063 Number) to use to conduct drug sales. The February 1, 2024, April 12, 2024, April 19, 2024, and August 16, 2024 fentanyl sales described above were all conducted by Andujar using the 8063 Number.

18. Bernabel Arrested For Drug Trafficking. On January 20, 2024, Bernabel was arrested by a trooper with the Massachusetts State Police ("MSP") for operating a motor vehicle

without a license and possession with intent to distribute classes heroin / fentanyl and cocaine. At 11:20 a.m., a trooper conducted a traffic stop of Bernabel driving the 2008 Ford Edge in the area of Route 24 north in Avon for civil motor vehicle infractions. When the MSP trooper asked Bernabel if he had any weapons on his person, he provided a knife from his pocket. The trooper recovered a Dominican Republic license bearing Bernabel's photograph from the front seat of the car but Bernabel did not have a Massachusetts driver's license. In the center console, the trooper observed a plastic bag containing 11 individually packaged bags, nine containing a brown powder substance believed to be heroin or fentanyl, and two containing an off-white rock like substance believed to be cocaine. The trooper also located another plastic bag with six individually packaged bags containing heroin/fentanyl or cocaine. The vehicle was towed, Bernabel was arrested, and he and the 2008 Ford Edge were transported to the local MSP barracks. At booking, Bernabel provided a residential address of 220 High Street in Brookline, an address that corresponded to the phone number used by Bernabel during the December 2023 deal and the owner of the Ford Edge used during the December 13, 2023 deal. Bernabel's booking sheet also lists a phone number of 617-37~~3~~-7335, which is one digit off from Bernabel's previously used number of 617-37~~2~~-7335.<sup>2</sup> Bernabel was released on bail on January 22, 2024. His state case remains pending. After Bernabel's arrest, records from the RMV reflected that the registration for the 2008 Ford Edge that Bernabel was driving on December 13, 2023 and January 20, 2024 was cancelled on or about February 1, 2024. A certificate of analysis from the MSP laboratory confirmed that the items seized from Bernabel contained fentanyl and cocaine.

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<sup>2</sup> I believe either Bernabel provided an incorrect phone number at booking or the booking officer made a clerical error when inputting in Bernabel's phone number. I am not formulating an inference, positive or negative, as a reason for the discrepancy. For the reasons described herein, the 7335 Number was the number used by Bernabel up to the time of this arrest.

19. New Phone Number for Bernabel. Even before Bernabel's arrest by MSP, agents had identified another phone number believed to be used by him, 508-863-0236, with no subscriber information. Bernabel's 0236 Number was in contact with two telephone numbers provided by Andujar to the UC during this investigation to further the drug trafficking set out above, including the 8063 Number described above. Agents identified the 0236 Number as Bernabel's cell phone based on contacts between the 0236 Number and Andujar's phones.

20. On January 20, 2024, the day Bernabel was arrested, the Bernabel 0236 Number had incoming and outgoing contacts at approximately 9:55 a.m., 10:01 a.m., and 10:02 a.m. with phone number 508-207-3571, subscribed to Tina M. Bishop of 108 Hayward Avenue in Brockton, Massachusetts. Shortly after 11:00 a.m., Bernabel was arrested driving northbound on Route 24 in Avon, which is north of Brockton. Thereafter, there were no further outgoing communications on the 0236 Number. This pattern of activity is consistent with Bernabel's having traveled to Brockton to meet with Bishop (or the user of 508-207-3571 number), his having been stopped and arrested on the way back to Boston, the 0236 Number having been out of his possession while he was in custody, and the 0236 Number having been returned to him when he was released from custody. Bernabel ceased using the 0236 Number after his arrest. Through my training and experience, I know that drug traffickers will often stop using their distribution telephone after they are arrested and the traffickers will often get a new phone at this time.

21. After Bernabel's arrest, through common call analysis, agents identified a new cell phone for Bernabel, 774-493-3768, that was activated on January 23, 2024 (three days after Bernabel's arrest). Between January 23, 2024 and February 11, 2024, the 3768 Number was in contact with seventeen unique telephone numbers. Seven of those numbers (or 41%) previously were in contact with Bernabel's old 0236 Number. These common contacts include Andujar's



8063 Number and the number for Tina Bishop (described above). Bernabel's 3768 Number had 614 contacts with Andujar's 8063 number between January 23, 2024 and February 11, 2024.

22. Bernabel Supplied Andujar With Fentanyl. On April 12, 2024, at approximately 8:52 a.m., the UC sent Andujar a WhatsApp message at Andujar's 8063 Number indicating that the UC needed 2,000 "fent candy" (referring to fentanyl pills). At around 8:53 a.m., the UC placed a WhatsApp call to Andujar's 8063 Number during which the UC requested 2,000 pills. Andujar and the UC negotiated the price of the pills and planned to meet at 11:00 a.m. near 85 Station Landing in Medford in order for Andujar to provide the UC with 2,000 fentanyl pills and a sample of methamphetamine. Through toll analysis, agents determined that approximately four minutes later, at 8:57 a.m., Andujar's 8063 Number called Bernabel's 3768 Number.

23. At approximately 9:32 a.m., data from a court-authorized GPS device on a 2009 black Saturn Vue, registered to Gisel Solainy Arias-Mendez at 220 High Street, Brookline, Massachusetts, and used by Bernabel left the area of 94 Walnut Avenue, Roxbury, Massachusetts. Through physical surveillance and data from the GPS device, agents knew that Bernabel lived at that address at that time.<sup>3</sup> Agents had observed vehicles used by Bernabel parked overnight on streets near that residence. At approximately 9:38 a.m., DEA Special Agent Glynn observed Bernabel's Saturn arrive at 493 Columbia Road. Through physical surveillance, agents knew that Andujar lived at that address at that time. Andujar's driver's license also listed that address as his residence. Toll records for Bernabel's 3768 Number showed that it placed a call to Andujar's 8063 Number at around 9:40 a.m. One minute later, at around 9:41 a.m., Bernabel exited the

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<sup>3</sup> This was a large multi-unit structure. Agents were not able to identify the specific mailing address for Bernabel's apartment but confirmed that he lived in this building. After this deal, Bernabel moved to a different residence, as did Andujar.

Saturn and entered 493 Columbia Road. Agents identified Bernabel as he stood at the door of the first floor of 493 Columbia Road, an address where investigators knew Andujar resided at the time (shortly after this deal, Andujar moved to a new residence). One minute later, at 9:42 a.m., Bernabel exited 493 Columbia Road and returned to the Saturn and at 9:50 a.m. left the area.

24. At around 10:49 a.m., the UC placed a call to Andujar's 8063 Number stating that the UC had arrived at the meet location near 49 Station Landing in Medford. Once in the car, Andujar provided the UC with two clear plastic bags containing 2,000 blue pressed pills, organized in twenty smaller clear plastic bags. Andujar also handed the UC a bag containing a sample of a crystal substance believed to be methamphetamine.

25. After Andujar's hand-to-hand with the UC, a trooper with MSP conducted a stop at around 11:22 a.m. of Andujar. Andujar was the sole occupant of the car and provided a valid Massachusetts Driver's License to the trooper.

26. Based on the quick nature of the exchange and the phone contacts between Andujar, Bernabel, and the UC, I believe based on my training and experience that Bernabel supplied fentanyl pills to Andujar and that a short time later Andujar delivered the fentanyl pills to the UC. As noted above, these 2,000 pills contained fentanyl.

27. FABAL. On August 16, 2024, at approximately 10:00 a.m., agents commenced surveillance in the vicinity of Gem Auto Parts, located at 261 North Avenue, Wakefield, Massachusetts. Agents learned that Andujar had recently begun to work at the store and agents established surveillance in anticipation of making a controlled purchase of pressed fentanyl pills from Andujar later that day.

28. Agents observed a white Honda used at the time by Andujar in the store's rear parking lot. At approximately 10:13 a.m., the UC contacted Andujar by phone and ordered the

fentanyl pills. Andujar advised the UC that he would reach out to his “supplier” and would contact the UC later. For several hours, using physical surveillance and data from a GPS device on the Honda, agents followed Andujar as he made what appeared to be deliveries of auto parts to several businesses and gas stations. On at least two occasions, agents observed Andujar speaking on a cellular telephone during or after these deliveries. At 12:37 p.m., the UC advised agents that Andujar had called him. Andujar reported to the UC that he would arrive at Gem Auto Parts in fifteen minutes.

29. At 12:39 p.m., agents observed the white Honda return to the rear parking lot of Gem Auto Parts. A short time later, agents observed a 2014 white Ford Edge registered to Patricia Santos-Tejada, 56 Bragdon Street, Apartment 4, Boston, Massachusetts arrive in the rear parking lot. Agents saw Andujar get out of the white Honda while speaking on a cellular telephone. Andujar opened the white Honda’s front passenger side door, picked up an item, and walked to the passenger side of the Ford Edge. At 12:45 p.m., agents saw Andujar walk away from the passenger side of the Ford Edge carrying a bright green bag. Andujar walked over to the white Honda and opened the front passenger door. At the same time, the Ford Edge backed out of its parking space and came to a stop in the rear parking lot. Agents saw Andujar walk back to the Ford Edge and had a brief conversation with the driver, who agents observed as a Hispanic male wearing a black baseball cap and sunglasses. Agents noted that Andujar was not carrying the green bag when he returned to the Ford Edge.

30. At 12:46 p.m., agents saw the Ford Edge leave the rear parking lot. Agents eventually followed the Ford Edge to the Hilton Garden Inn at Logan Airport and saw the driver enter the hotel. Agents later observed the driver in or around the Ford Edge and noted that he was wearing a uniform worn by shuttle bus drivers employed by the hotel. From these observations,

agents identified Fabal as the individual who met with Andujar.

31. After the Ford Edge left Gem Auto Parts, Andujar notified the UC that he was ready. At 12:47 p.m., agents observed Andujar standing near the front passenger side of the white Honda. Moments later, he closed the passenger door and went inside Gem Auto Parts. At 1:00 p.m., the UC arrived and parked a short distance away from the white Honda. Andujar motioned to the UC to park a short distance away on Chestnut Street. Agents observed Andujar walk to the passenger side door of the white Honda. Andujar retrieved an item and walked to the UC's vehicle. At 1:01 p.m., agents saw Andujar enter the UC vehicle. Once inside, the audio-video recording captured Andujar as he handed the UC 2000 pressed fentanyl pills. Andujar also provided the UC with two clear plastic baggies containing a brown powdery substance that Andujar identified as fentanyl. Andujar advised the UC that the baggies were a free sample.

32. At 1:03 p.m., agents saw Andujar get out of the UC vehicle and return to the driver's side of the Honda. The UC left the parking lot and returned to a predetermined meeting location where the UC handed in the fentanyl pills, fentanyl sample, and the recording equipment. The items were sent to the DEA NERL for testing, which is pending.

33. On August 20, 2024, agents established surveillance in the vicinity of 56 Bragdon Street, located in the Roxbury section of Boston. As noted above, the Ford Edge was registered to Patricia Santos-Tejada at that address. At 1:13 p.m., agents located the Ford Edge parked on Bragdon Street between Columbus Avenue and Washington Street. At 1:44 p.m., agents observed an Hispanic male, later identified as Fabal, with close-cropped black hair and a thin graying beard, wearing a white t-shirt, and carrying a fanny pack over his right shoulder, walking from Columbus Avenue onto Bragdon Street. Fabal opened the passenger side door of the Ford Edge, placed some items inside the car, closed the door, and walked around to the driver's side door. Fabal then sat

down in the driver's seat, started the Ford Edge, and drove the car to a parking lot in the rear of 56 Bragdon Street. At 1:49 p.m., I observed Fabal walk up the fire escape to the second floor of 56 Bragdon Street.

34. At 2:12 p.m., I observed the Ford Edge leave 56 Bragdon Street and turn left onto Ernst Street. The Ford Edge turned left onto West Walnut Park, then right onto Columbus Avenue, and then cut across two bus lanes before entering a Mobil gas station. After a brief stop, the Ford Edge proceeded onto West Walnut Park. Agents noted that the Ford Edge had an inoperable rear taillight. A marked Boston Police cruiser in the area pulled in behind the Ford Edge and activated its emergency lights. The Ford Edge pulled over near the intersection of West Walnut Park and Washington Street. Officers approached the Ford Edge and spoke to Fabal and sole occupant who produced an active Massachusetts driver's license in the name of Carlos M. Fabal, date of birth X-X-72. Fabal's license listed his residence as 56 Bragdon Street, Apartment 4, Boston, Massachusetts. Officers issued a verbal warning to Fabal and Fabal drove off in the Ford Edge. Agents followed Fabal until he pulled the Ford Edge to the curb on Walnut Park near Waldren Road. Fabal walked to the rear of the Ford Edge where he appeared to inspect the brake lights.

35. A review of Fabal's criminal history revealed that Fabal was convicted in 2007 in U.S. District Court in Boston of conspiracy to distribute and to possess with intent to distribute cocaine and heroin. *See United States v. Carlos Fabal*, Cr. No. 06-10292-PBS. Fabal was sentenced to 67 months in prison and 5 years of supervised release.

36. Toll records showed that on August 16, 2024, a T-Mobile cellular telephone number, 617-821-7027, registered in Fabal's name and registered to 56 Bragdon Street, Apartment 4, Roxbury (Boston), Massachusetts, the address listed by the Registry of Motor Vehicles as Fabal's home residence, was in regular contact with Andujar's 8063 Number.

Specifically, Fabal's 7027 Number was in contact with Andujar's 8063 Number thirteen times on August 16, 2024. At 10:23 a.m., Andujar called Fabal's 7027 Number for one minute and five seconds. This call was after the 10:13 a.m. call where the UC ordered the fentanyl pills from Andujar and Andujar advised the UC that he would reach out to his supplier. At 10:31 a.m. and 10:43 a.m., Fabal's 7027 Number called Andujar's 8063 Number, each call lasted 32 seconds. At 10:50 a.m., Fabal's 7027 Number called Andujar for 3 seconds. Thirteen seconds later, Andujar placed an outgoing call to Fabal's 7027 Number that lasted one minute and eleven seconds. At 11:40 a.m., Andujar called Fabal's 7027 Number for fourteen seconds, and at 12:19, Andujar called Fabal's 7027 Number for 55 seconds. The next two calls were brief: at 12:20 p.m., Fabal's 7027 Number placed a one second call to Andujar, and at 12:37 p.m., Fabal's 7027 Number called Andujar for two seconds. At 12:39 p.m., around the time that Fabal's Ford Edge arrived at Gem Auto Parts, Fabal's 7027 Number placed a 39 second call to Andujar's 8063 Number.

37. The phones were in contact with each other later in the day as well. At 5:53 p.m., Fabal's 7027 Number placed a one minute and twenty-eight second call to Andujar's 8063 Number. At 6:03 p.m., Fabal's 7027 Number placed a three second call to Andujar's 8063 Number. Seven seconds later, Andujar's 8063 Number was in contact with Fabal's 7027 Number for ten seconds.

38. Based on my training and experience, I believe that Andujar called his "supplier," Fabal, and ordered pressed fentanyl pills. In the same way that Bernabel delivered pressed fentanyl pills to Andujar for sale to the UC, Fabal delivered pressed fentanyl pills to Andujar, who then delivered them to the UC.

39. Conclusion. For the reasons set out above, I respectfully submit that there exists probable cause to believe that (1) Anderson Ernesto Andujar Echavarria (“Andujar”), (2) Waner Bernabel Presinal (“Bernabel”), and (3) Carlos Fabal (“Fabal”) conspired to distribute and possess with intent to distribute controlled substances, that is, fentanyl, methamphetamine, and cocaine, in violation of Title 21, United States Code, Section 846.

Respectfully submitted,

/s/ Jeffrey M. Brown

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Jeffrey M. Brown  
Task Force Officer  
Drug Enforcement Administration

Sworn to via telephone in accordance with Federal Rule of Criminal  
Procedure 4.1 on September 12, 2024

  
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HON. M. PAGE KELLEY  
UNITED STATES MAGISTRATE JUDGE

